

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

RAFAT JAMAL MAWLAWI,
CHANDRA NETTERS LOFTON TAYLOR,
KARIM RAMZI,

Defendants.

FILE UNDER SEAL

No. 05-20113

8 U.S.C. § 1325(c)
18 U.S.C. § 371
18 U.S.C. § 2

Robert R. Di Tollo
CLERK U.S. DIST. CT.
W.D. OF TENN. MEMPHIS

INDICTMENT

THE GRAND JURY CHARGES:

At all times material to this indictment:

- A. **Rafat Jamal Mawlawi** was a citizen of the United States.
- B. **Chandra Netters Lofton Taylor** was a citizen of the United States.
- C. **Karim Ramzi** was a citizen of Morocco.

COUNT 1

D. Beginning in or about September 2002, the exact date being unknown to the Grand Jury, and continuing until the present in the Western District of Tennessee and elsewhere, the defendants,

-----**RAFAT JAMAL MAWLAWI**-----
-----**CHANDRA NETTERS LOFTON TAYLOR**-----
and
-----**KARIM RAMZI**-----

did unlawfully, willfully, and knowingly, conspire, combine, confederate, and agree with each other and other persons known and unknown to the Grand Jury, to commit certain

①

offenses against the United States of America, that is:

1. To make materially false, fictitious, and fraudulent statements and representations and to make and use false writings and documents knowing the same to contain materially false, fictitious and fraudulent statements and entries, in a matter within the jurisdiction of the Immigration and Naturalization Service, a department of the government of the United States, in violation of Title 18, United States Code, Section 1001.
2. To knowingly make under oath, and as permitted under penalty of perjury under section 1746 of title 28, United States Code, knowingly subscribe as true, false statements with respect to material facts in applications, affidavits, and other documents required by the immigration laws and regulations prescribed thereunder, and knowingly present such applications, affidavits, and other documents which contain false statements and which fail to contain a reasonable basis in law and fact in violation of Title 18, United States Code, Section 1546.

OBJECT, MEANS AND METHOD OF THE CONSPIRACY

E. It was the object of the conspiracy that the defendants and co-conspirators unlawfully obtained, and attempted to obtain a non-immigrant visa, immigrant visa and lawful permanent resident alien status from the Immigration and Naturalization Service (Department of Homeland Security) on behalf of defendant **Karim Ramzi**.

F. To accomplish the object of the conspiracy, **Rafat Jamal Mawlawi**, assisted by Janet Netters Austin, recruited **Chandra Netters Lofton Taylor** to travel to Morocco, enter into a sham marriage engagement with **Karim Ramzi**, and to produce fraudulent

applications for fiancé visas in order to allow **Karim Ramzi** to unlawfully come to, enter, and reside in the United States.

G. The defendants did this for their own personal gain, benefit, profit, advantage, and accommodation.

Overt Acts

H. In furtherance of the conspiracy and to effect the objects thereof, at least one of the following overt acts was committed by at least one of the co-conspirators:

1. On or about September 11, 2002, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 668, payable to **Chandra Netters**, and drawn on First Tennessee Bank Account #100152476, in the amount of \$1,400.00.

2. On or about September 15, 2002, **Chandra Netters Lofton Taylor** traveled from Memphis, Tennessee, to Morocco.

3. On or about September 17, 2002, **Chandra Netters Lofton Taylor** returned from Morocco to the United States.

4. On or about September 20, 2002, **Chandra Netters Lofton Taylor** signed, and caused to be signed, an I-129F, Petition for Alien Fiancé.

5. On or about October 7, 2002, **Rafat Jamal Mawlawi and Chandra Netters Lofton Taylor** filed, and caused to be filed, an I-129F, Petition for Alien Fiancé with the Immigration and Naturalization Service.

6. On or about March 19, 2003, **Rafat Jamal Mawlawi and Chandra Netters Lofton Taylor** filed, and caused to be filed, additional documents with the Immigration and Naturalization Service in support of **Chandra Netters Lofton Taylor's** I-129F, Petition for

Alien Fiancé

7. On or about April 16, 2003, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 878, payable to **Chandra D. Netters**, and drawn on First Tennessee Bank Account #100152476, in the amount of \$500.00.
8. On or about April 23, 2003, **Chandra Netters Lofton Taylor** filed, and caused to be filed, an I-864, Affidavit of Support with the Department of Homeland Security.
9. On or about July 28, 2003, **Karim Ramzi** filed an application for immigrant visa with the United States Department of State.
10. On or about July 29, 2003, **Karim Ramzi** filed an application for non-immigrant fiancé visa with the United States Department of State.
11. On or about August 11, 2003, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 1004, payable to **Chandra Netters**, and drawn on First Tennessee Bank Account #100152476, in the amount of \$1,700.00.
12. On or about August 20, 2003, **Karim Ramzi** entered the United States.
13. On or about November 17, 2003, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 1061, payable to **Chandra Netters**, and drawn on First Tennessee Bank Account #100152476, in the amount of \$1,500.00.
14. On or about November 18, 2003, **Chandra Netters Lofton Taylor** and **Karim Ramzi** were wed.
15. On or about November 18, 2003, **Karim Ramzi** signed, and caused to be signed, an I-485, Petition to Adjust Status with the Department of Homeland Security.
16. On or about November 25, 2003, **Rafat Jamal Mawlawi** wrote, and caused

to be written, check # 1084, payable to INS, and drawn on First Tennessee Bank Account #100152476, in the amount of \$225.00.

17. On or about November 25, 2003, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 1085, payable to INS, and drawn on First Tennessee Bank Account #100152476, in the amount of \$170.00.

18. On or about December 16, 2003, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 2015, payable to **Chandra Netters**, and drawn on First Tennessee Bank Account #101211714, in the amount of \$200.00.

19. On or about January 17, 2004, **Rafat Jamal Mawlawi** wrote, and caused to be written, check # 1103, payable to **Chandra Netters**, and drawn on First Tennessee Bank Account #100152476, in the amount of \$200.00.

All in violation of Title 18, United States Code, Section 371.

[nmt 5 yrs., nmt \$250,000 fine, or both, plus a period of supervised release nmt 3 yrs., together with a mandatory special assessment of \$100, see 18 U.S.C. § 3013(a)].

COUNT 2

On or about November 18, 2003, in the Western District of Tennessee, the defendants,

-----**Chandra Netters Lofton Taylor**-----
and
-----**Karim Ramzi**-----

being aided and abetted each by the other, did knowingly enter into a marriage for the purpose of evading provisions of the immigration laws of the United States; in violation of Title 8, United States Code, Section 1325(c) and Title 18 United States Code, Section 2.

DATED: 3-31-05

A TRUE BILL:


FOREPERSON


for: UNITED STATES ATTORNEY